

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO, as  
representative of THE COMMONWEALTH OF  
PUERTO RICO, et al.,

Debtors

PROMESA Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

This filing relates to the  
Commonwealth.

**MOTION REQUESTING RULING ON THE PAPERS WITHOUT THE NEED TO  
APPEAR AT THE AUGUST 4, 2021 HEARING  
Re: Docket Nos. 16647, 17207, 17502, and 17558**

TO THE HONORABLE COURT:

The Puerto Rico Land Administration, through the undersigned counsel, very respectfully informs and requests:

1. Through Motion dated July 24, 2021, appearing Creditor informed its intention to appear and be heard at the August 4, 2021 Hearing in connection with the Three Hundred Twenty-First Omnibus Objection to Claim Nos. 50438 & 73021 (Docket No. 16647) of the Puerto Rico Land Administration (the "Claims"), one for \$1,129,811.76 and the other for \$36,386,620.57, and the Response to Objection to Claims (Docket No. 17207).
2. Having examined the arguments expounded by the Commonwealth in its Reply to Response filed Claimant Puerto Land Administration to Three Hundred Twenty-First Omnibus Objection to No Liability Claims (Docket No. 17558) and upon further reflection, the Puerto Rico Land Administration informs that it is unnecessary to address the matter during the August 4 with further argument. The request to be heard is consequently withdrawn.
3. Given that the Commonwealth's Reply does not contest that if the funds in question (Claim

No. 50438) are currently deposited with the Economic Development Bank for Puerto Rico in favor of the Puerto Rico Land Administration, as posited in our prior filings, the monies are not subject to Title III and hence, not under the jurisdiction of the Court. Consequently, the Puerto Rico Land Administration is in no need to argue further other than what it has stated in its filings at Docket Nos. 17207 and 17502. The result is the same under any scenario.

4. As argued in the Response at Docket Nos. 17207 and 17502, the deposits relevant to Claim No. 50438 cannot be considered Designated Deposits subject to the provisions of the GDB Restructuring Act and belong to the Puerto Rico Land Administration.

WHEREFORE, very respectfully it is requested that the Court take notice of the aforementioned and that the Court proceed to rule on the papers considering the Puerto Rico Land Administration's position as stated in its filings. The monies concerning Claim No. 50438 are deposited with the Economic Development Bank for Puerto Rico in favor of the Puerto Rico Land Administration, belong to the Puerto Rico Land Administration, and are not under the jurisdiction of the Court. Consequently, it is hereby requested that the Puerto Rico Land Administration and its counsel be excused from the August 4, 2021 hearing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, August 2, 2021.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY: that on this same date, I electronically filed the foregoing Notice with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered participants and attorneys of record.

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